



Mr. Samuel Borries  
On-Scene Coordinator  
USEPA Region 5  
77 West Jackson Boulevard (SE-5J)  
Chicago, IL 60604-3590

ARCADIS of New York, Inc  
30 West Monroe Suite 1710  
Chicago  
Illinois 60603  
Tel 312 332 4937  
Fax 312 332 4434  
www.arcadis-us.com

Subject

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Time Critical Removal Action – Former Plainwell Impoundment  
Monthly Report (April 2007)

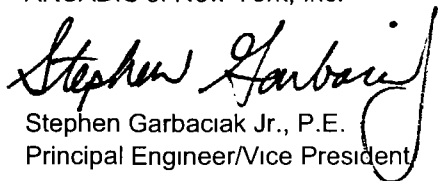
Dear Sam:

Attached is the second monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time Critical Removal Action. This progress report is submitted as per Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS of New York, Inc.

  
Stephen Garbaciak Jr., P.E.  
Principal Engineer/Vice President

Copies

Paul T. Bucholtz, MDEQ  
Shari Kolak, USEPA  
Bonnie A. Barnett, Esq , Drinker Biddle & Reath LLP  
Steven D. Cook, Esq , Millennium Holdings, LLC  
J. Michael Davis, Esq , Georgia-Pacific Corporation  
Mellonie S Fleming, Esq , Georgia-Pacific Corporation  
Mark E. Tapp, Millennium Holdings, LLC  
Paul A. Montney, P E , Georgia-Pacific Corporation  
L. Chase Fortenberry, P.G., Georgia-Pacific Corporation  
Mark P Brown, Ph.D., Georgia-Pacific Corporation

INDUSTRIAL

Date

May 15, 2007

Contact

Steve Garbaciak

Phone

312.332 4937 ext. 12

Email

steve.garbaciak@  
arcadis-us.com

Our ref

B0064530.670



Imagine the result

**ARCADIS** BBL

Mr Samuel Borries  
May 15, 2007

Blind Courtesy Copies

Matthew Bowman, P E ARCADIS BBLES

Michael Erickson, P E., ARCADIS BBL

Dawn E. Penniman, P E., ARCADIS BBL

Eric J. Hritsuk, P,E , ARCADIS BBL

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE  
TIME CRITICAL REMOVAL ACTION – FORMER PLAINWELL IMPOUNDMENT**

**REPORT #2, APRIL 2007**

**PREPARED BY ARCADIS BBL  
MAY 15, 2007**

**ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP**

**SUBMITTED TO**

**SAMUEL BORRIES, ON-SCENE COORDINATOR  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site TCRA**

**REPORT #2, APRIL 2007**

**Significant Developments and Activities During the Period**

- In April, the KRSG continued to submit Subcontractor Qualification Notifications to the USEPA, as required by Paragraph 11 of the TCRA AOC
- On April 2, the KRSG submitted ARCADIS BBL's *Quality Management Plan* to the USEPA, as required by paragraph 11 the TCRA AOC
- On April 2, the KRSG met with the City of Kalamazoo, the USEPA, and the MDEQ to discuss the disposal of TCRA-related soil and sediment at the Allied Paper, Inc. Operable Unit OU (Allied OU).
- On April 5, the KRSG received a copy of the buoy permit application as well as buoy rules and regulations from the MDNR
- On April 9, the KRSG submitted the *Quality Assurance Project Plan* (QAPP) for the Site to the USEPA, as required by Paragraph 17d of the TCRA AOC.
- On April 9, the KRSG submitted the *Health and Safety Plan* (HSP) for the Site to the USEPA
- On April 12, the KRSG, MDEQ and USEPA had a Pre-Construction Meeting at the former Plainwell Impoundment.
- On April 13, the USEPA released a press release titled *Kalamazoo River Cleanup Delayed; Additional Community Input Planned*.
- On April 13, the On-Scene Coordinator (OSC) directed KRSG to stop all work at the Allied OU and to take steps necessary to stop all work on the project by the end of the day of April 18.
- On April 16, the KRSG submitted the first monthly progress report to the USEPA, as required by Section 19a of the TCRA AOC.
- On April 16, the KRSG and the USEPA participated in a conference call to discuss interim plans for waste disposal at the Allied OU.
- On April 17, the KRSG forwarded the air monitoring section of the USEPA's Bryant Mill Pond TCRA Final Report to the USEPA.
- On April 19, the KRSG submitted a certificate of insurance to the USEPA, as required by Section 82 of the TCRA AOC
- On April 20 and 23, the KRSG submitted a proposed sign to be displayed outside of the work areas to the USEPA and MDNR

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site TCRA**

**REPORT #2, APRIL 2007**

- On April 20, the KRSG submitted a proposed protocol to be used determine which excavated materials will be defined as TSCA waste to the USEPA.
- On April 24, the KRSG submitted a letter proposing changes to the Work to be performed as a part of the TCRA to the USEPA.
- On April 25, the KRSG submitted the *Field Sampling Plan* (FSP) for the Site to the USEPA.
- On April 25, the USEPA issued a press release titled *Kalamazoo River Update: New Plan for 2007 Dredge Disposal Announced*.
- On April 27, the KRSG submitted the Plainwell Dam Well Completion/Closure Memo to the MDNR.
- Paragraph 23 of the TCRA AOC requires the KRSG obtain access from private property owners as necessary to implement the TCRA. As of April 30, 2007, the KRSG had obtained property access agreements from five of the 14 required property owners (Table A).

**Data Collected and Field Activities Conducted During the Period**

- During the week of April 9, the KRSG started site preparation (clearing and grubbing, installation of silt fences, construction of access roads, installation of site security measures) at the former Plainwell Impoundment.
- On April 18, the KRSG stopped construction activities at Removal Areas 1 and 2 at the former Plainwell Impoundment at the direction of the USEPA.

**Laboratory Data Received During the Period**

- None

**Problems**

- The TCRA Design Report calls for the construction of Staging Area 4N and the access road to it being constructed on property owned by the Robert Foster Trust. The Robert Foster Trust has denied the KRSG's request for access to their property.
- Citizens and elected officials from the City of Kalamazoo and surrounding areas protested the use of the Allied OU for the disposal of PCB-containing soil and sediment.
- On April 13, the USEPA OSC directed KRSG to stop all work at the Allied OU and to take steps necessary to stop all work on the project by the end of the day of April 18.

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
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**Actions Taken to Correct Problems**

- The KRSG approached Consumers Energy and is in negotiations to construct an access road from the Kalamazoo River to Miller Road related to Staging Area 4N. Locations not on property owned by the Robert Foster Trust, are being evaluated for the construction of Staging Area 4N.
- On April 25, the USEPA accepted the KRSG's proposal to transport all excavated materials to an off-site disposal facility in 2007 and not to the Allied OU.

**Developments Anticipated During the Next Reporting Period**

- During May, the KRSG will continue to negotiate property access agreements, as required by Paragraph 23 of the TCRA AOC (Table A).
- In May, the KRSG will continue to submit Subcontractor Qualification Notifications to the USEPA, as required by Paragraph 11 of the TCRA AOC.
- Starting May 2, the KRSG is scheduled resume site preparation activities.
- On May 2, the KRSG is scheduled to submit a revised copy of the HSP to the USEPA.
- During the week of May 7, the KRSG is scheduled to continue site preparation activities.
- During the week of May 7, the KRSG is scheduled to receive trilateral test results of the geotechnical samples collected during March at the Allied OU.
- During the week of May 14, the KRSG is scheduled to begin construction of Staging Area 1N.
- During the week of May 28, the KRSG is scheduled to place buoys and signs upstream and downstream of the work area in order to prevent boat traffic in the area.

**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Former Plainwell Impoundment TCRA  
April Monthly Report**

**Table A — Summary of Property Access Agreements (as of April 30, 2007)**

<b>Date Sent</b>	<b>Property Owner</b>	<b>Status</b>
3/19/2007	A C. Geenen Associates	no response
3/9/2007	Aggregate Industries	no response
3/9/2007	Allen Robinson	accepted
3/9/2007	Balkema Excavating	no response
3/9/2007	Brad Keeler	accepted
3/9/2007	City of Plainwell	no response
3/26/2006	Consumers Energy	no response
3/9/2007	Meijer, Inc.	no response
3/21/2007	Plainwell Group LLC	no response
3/16/2007	Robert Foster Trust	rejected
3/9/2007	Robert Keeler Trust	accepted
3/9/2007	Rolfe Family Trust	accepted
3/16/2007	Shirley Foster	no response
3/9/2007	Steven Peterson	accepted